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Pro Se Litigant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ROBERT MARTINSON,

Plaintiff,

vs.

CITY OF SACRAMENTO; DANIEL
HAHN, CHIEF OF POLICE; JOE ELLIS,
DETECTIVE POLICE OFFICER; TODD
CULP, DETECTIVE POLICE OFFICER;
and DOES 1-10,

Defendants.

Case No.: 2:21-cv-02130-DAD-JDP (PS)

**JOINT STIPULATION AND
MOTION OF THE PARTIES TO
AMEND INITIAL SCHEDULING
CONFERENCE AND STATUS
REPORT DATES; ~~PROPOSED~~
ORDER**

Date: October 5, 2023
Time: 10:00AM
Before: Hon. Jeremy Peterson

COME NOW THE PARTIES, Plaintiff Robert Martinson, and Defendants City of Sacramento, Daniel Hahn in his former capacity as Chief of Police, Officer Joe Ellis, and Sergeant Todd Culp (collectively "Defendants," and jointly with Plaintiff "Parties"), through their attorneys of record, jointly move the Court to amend the scheduling order and continue the upcoming pretrial deadlines (Dkt. No. 13) pursuant to Federal Rule of Civil Procedure 16(b)(4) for good cause.

1 WHEREAS, Plaintiff filed his complaint against Defendants with this Court on
2 November 17, 2021;

3 WHEREAS, Plaintiffs effectuated proper service of this matter on Defendants on July 24,
4 2023;

5 WHEREAS, this Court issued an Order on August 20, 2023, setting the Initial Scheduling
6 Conference on October 5, 2023 at 10:00AM via videoconference;

7 WHEREAS, the Order also required the parties to file Status Reports with this Court no
8 later than September 21, 2023;

9 WHEREAS, Plaintiff pleads for relief on the grounds of good cause as a result of
10 substantial medical issues, including surgery and recovery from said surgery, which interfere
11 with the September 21, 2023, and October 5, 2023, dates ordered by this Court for the filing of
12 the Initial Status Report and the Initial Scheduling Conference;

13 WHEREAS, Defendants are willing to stipulate to a continuance of the Initial Scheduling
14 Conference and an extension of the filing date for the Initial Status Reports as a result of
15 Plaintiff's good cause, pending the consent and discretion of this Court; and

16 WHEREAS, the parties jointly stipulate to such continuance and extension of the above
17 dates before this Court;

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1 THEREFORE, the parties hereby jointly and respectfully request that this Court grant the
2 relief sought by this motion and continue the Initial Scheduling Conference to December 14,
3 2023, at 10:00AM, and extend the filing date of the Initial Status Report commensurate with
4 that date to November 30, 2023.

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6 DATED: September 15, 2023

SUSANA ALCALA WOOD,
City Attorney

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9 By: /s/ KATE D.L. BROSSEAU
10 **KATE D.L. BROSSEAU**
Deputy City Attorney

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12 DATED: September 15, 2023

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14 By: /s/ ROBERT MARTINSON
15 **ROBERT MARTINSON**
Pro Se

~~[PROPOSED]~~ ORDER

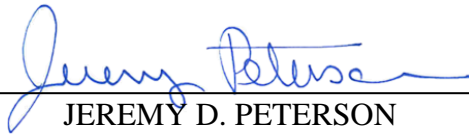
Based on the Joint Application of the parties to this action, and good cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Initial Scheduling Conference for this matter shall be continued from October 5, 2023 at 10:00AM to December 14, 2023 at 10:00AM.
2. The Initial Status Reports for this matter shall be filed no later than November 30, 2023.

IT IS SO ORDERED.

Dated: September 18, 2023


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE